

**SEALED**

**FILED**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2013 FEB 20 PM 1:07

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

BY *[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA,

§ CRIMINAL NO.

Plaintiff,

§ I N D I C T M E N T

V.

§ [Violation: Counts 1-5  
§ 26 U.S.C. § 7201, Tax Evasion]

DANIEL ISAIAH THODY,

Defendant.

§ **SA13CR0153 OG**

THE GRAND JURY CHARGES:

**COUNT ONE**  
[26 U.S.C. § 7201]

During the calendar year 2006, the Defendant, DANIEL ISAIAH THODY, a resident of the Western District of Texas, had and received taxable income upon which there was a substantial income tax due and owing to the United States of America. Well knowing and believing the foregoing facts, and failing to make an income tax return on or before April 15, 2007, as required by law, to any proper officer of the Internal Revenue Service, and pay to the Internal Revenue Service the income tax, the Defendant, from on or about January 1, 2006, to on or about December 31, 2006, in the Western District of Texas did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by executing government defense contracts in the name of WET Publishing -- a nominee company through which the Defendant operated his business, in order to conceal and attempt to conceal from all proper officers of the United States of America his true and correct income.

All in violation of Title 26, United States Code, Section 7201.

**COUNT TWO**  
[26 U.S.C. § 7201]

During the calendar year 2007, the Defendant, **DANIEL ISAIAH THODY**, a resident of the Western District of Texas, had and received taxable income upon which there was a substantial income tax due and owing to the United States of America. Well knowing and believing the foregoing facts, and failing to make an income tax return on or before April 15, 2008, as required by law, to any proper officer of the Internal Revenue Service, and pay to the Internal Revenue Service the income tax, the Defendant, from on or about January 1, 2007, to on or about December 31, 2007, in the Western District of Texas did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by executing government defense contracts in the name of WET Publishing -- a nominee company through which the Defendant operated his business, in order to conceal and attempt to conceal from all proper officers of the United States of America his true and correct income.

All in violation of Title 26, United States Code, Section 7201.

**COUNT THREE**  
[26 U.S.C. § 7201]

During the calendar year 2008, the Defendant, **DANIEL ISAIAH THODY**, a resident of the Western District of Texas, had and received taxable income upon which there was a substantial income tax due and owing to the United States of America. Well knowing and believing the foregoing facts, and failing to make an income tax return on or before April 15, 2009, as required by law, to any proper officer of the Internal Revenue Service, and pay to the Internal Revenue Service the income tax, the Defendant, from on or about January 1, 2008, to on

or about December 31, 2008, in the Western District of Texas did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by executing government defense contracts in the name of WET Publishing -- a nominee company through which the Defendant operated his business, in order to conceal and attempt to conceal from all proper officers of the United States of America his true and correct income.

All in violation of Title 26, United States Code, Section 7201.

**COUNT FOUR**  
[26 U.S.C. § 7201]

During the calendar year 2009, the Defendant, **DANIEL ISAIAH THODY**, a resident of the Western District of Texas, had and received taxable income upon which there was a substantial income tax due and owing to the United States of America. Well knowing and believing the foregoing facts, and failing to make an income tax return on or before April 15, 2010, as required by law, to any proper officer of the Internal Revenue Service, and pay to the Internal Revenue Service the income tax, the Defendant, from on or about January 1, 2009, to on or about December 31, 2009, in the Western District of Texas did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by executing government defense contracts in the name of WET Publishing -- a nominee company through which the Defendant operated his business, as well as using another individual's bank account, in order to conceal and attempt to conceal from all proper officers of the United States of America his true and correct income.

All in violation of Title 26, United States Code, Section 7201.

**COUNT FIVE**  
[26 U.S.C. § 7201]

During the calendar year 2010, the Defendant, **DANIEL ISAIAH THODY**, a resident of the Western District of Texas, had and received taxable income upon which there was a substantial income tax due and owing to the United States of America. Well knowing and believing the foregoing facts, and failing to make an income tax return on or before April 15, 2011, as required by law, to any proper officer of the Internal Revenue Service, and pay to the Internal Revenue Service the income tax, the Defendant, from on or about January 1, 2010, to on or about December 31, 2010, in the Western District of Texas did willfully attempt to evade and defeat the income tax due and owing by him to the United States of America for the calendar year by executing government defense contracts in the name of WET Publishing -- a nominee company through which the Defendant operated his business, as well as using another individual's bank account, in order to conceal and attempt to conceal from all proper officers of the United States of America his true and correct income.

All in violation of Title 26, United States Code, Section 7201.

A TRUE BILL.

  
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FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

BY:

  
\_\_\_\_\_  
MARK T. ROOMBERG  
Assistant United States Attorney